

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

## Alexandria Division

UNITED STATES OF AMERICA, )

V.

Case No. 1:23CR65-CMH

JAMES MEEK. )

**CONSENT MOTION TO CONTINUE TRIAL DATE**

James Meek, through counsel, and with consent of the government, respectfully moves to continue the trial in this matter, currently scheduled for July 5, 2023 for approximately 30 days and set the trial on July 23 or 24, or August 3, 2023, and to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) from June 21, 2023 until the new trial date. In support of this motion, Mr. Meek states as follows:

1. The Court has set the trial in this matter to commence on July 5, 2023;
2. The parties have been engaged in productive discussions regarding a potential resolution of this matter. Specifically, the parties have discussed the potential of a Fed. R. Crim. Proc. 11(a)(2) conditional plea that would preserve Mr. Meek's Fourth Amendment claims for appellate review while obviating the need for a trial;
3. Given the law governing conditional plea agreements, and the specific facts and procedural posture of this case, the parties are working to reach an agreement as to the scope and substance of the issues covered by the conditional plea. This is an issue that requires further research and discussion by the parties. Furthermore, a proposed resolution of the case pursuant to a conditional plea would require the approval of management on the part of the United State Attorney's Office and the Department of Justice;

4. Pursuant to 18 U.S.C. § 3161(h)(7)(A), Mr. Meek moves to exclude time under the Speedy Trial Act in the interests of justice from June 21, 2023 until a date determined by the Court on which the trial shall commence. As noted, this additional period is necessary to allow the parties to engage in discussions regarding the possible resolution of the case. The parties respectfully submit that the ends of justice served by such exclusion would outweigh the best interest of the public and the defendant in a speedy trial;
5. Counsel for Mr. Meek has conferred with the government regarding this motion, and the government does not oppose a continuance in this matter. The parties have also conferred regarding potential trial dates, and are available to for trial on July 24, 25, or August 2, 2023, or another date on which the Court is available;
6. Undersigned counsel has conferred with Mr. Meek regarding this request and his Speedy Trial rights. Mr. Meek agrees to the exclusion of time under the Speedy Trial Act as set forth in this motion.

WHEREFORE, for all of the foregoing reasons, this Court should continue this trial by approximately 30 days, and exclude time under the Speedy Trial Act from June 21, 2023 until the date on which trial is set to commence.

Respectfully Submitted,

By: /s/ Eugene V. Gorokhov  
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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document VIA ECF which provides a copy to the AUSA of record.

By: /s/ Eugene V. Gorokhov  
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